

RMY/MZG:2010R00456

FEB 23 2011
CLERK AT GREENBELT
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

DEPUTY

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

UNITED STATES OF AMERICA

v.

JAMES MONROE DAVIS,
a/k/a "Jay,"

Defendant.

: CRIMINAL NO. DKC 11 CR 0090

: (Conspiracy to Commit Sex Trafficking,
 : 18 U.S.C. § 1594(c); Sex Trafficking,
 : 18 U.S.C. § 1591(a); Use of Interstate
 : Facilities to Transmit Information
 : About a Minor, 18 U.S.C. § 2425,
 : Transporting a Minor to Engage in
 : Prostitution, 18 U.S.C. § 2423(a),
oOo... Aiding & Abetting, 18 U.S.C. § 2)

INDICTMENTCOUNT ONE
(Conspiracy to Commit Sex Trafficking)

The Grand Jury for the District of Maryland charges that:

Introduction

At all times relevant to this Indictment,

1. Defendant JAMES MONROE DAVIS, a/k/a "Jay," was a resident of Maryland and Washington, DC, and was born in 1986.

The Minor Sex Trafficking Victim

2. At all times relevant to this Indictment, a minor female, [REDACTED] " was a victim of the crimes alleged herein. The minor female was a resident of [REDACTED], was under the age of 18, and born in [REDACTED]

The Conspiracy

3. Beginning on at least April 21, 2010 and continuing through on or about April 26,

2010, in the State and District of Maryland and elsewhere, the defendant,

JAMES MONROE DAVIS, a/k/a "Jay,"

together with DUANE MASON, a/k/a "Z-way," a/k/a "Troy Dickerson," and others, known and unknown to the Grand Jury, did knowingly in and affecting interstate and foreign commerce, combine, conspire, confederate and agree to commit an offense against the United States, namely, to recruit, entice, harbor, transport, provide, obtain, or maintain by any means a person, namely, [REDACTED], and benefit financially and by receiving anything of value from participation in a venture engaged in such acts, knowing, or in reckless disregard of the fact, that means of force, threats of force, fraud, and coercion as defined in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause [REDACTED] to engage in a commercial sex act, and knowing, and in reckless disregard of the fact, and having had a reasonable opportunity to observe [REDACTED], that [REDACTED] had not attained the age of 18 years and would be caused to engage in a commercial sex act, all in violation of Title 18, United States Code, Section 1591(a).

Manner and Means of the Conspiracy

5. It was part of the conspiracy that **JAMES MONROE DAVIS, a/k/a "Jay,"** DUANE MASON a/k/a "Z-way," a/k/a "Troy Dickerson," and others both known and unknown to the Grand Jury, received monies and other things of value by having the minor victim engage in commercial sex acts.

6. It was further part of the conspiracy that DUANE MASON a/k/a "Zway," a/k/a "Troy Dickerson," targeted vulnerable adult females to engage in commercial sex acts.

7. It was further part of the conspiracy that **JAMES MONROE DAVIS, a/k/a**

“Jay,” DUANE MASON a/k/a “Z-way,” a/k/a “Troy Dickerson,” and others both known and unknown to the Grand Jury, provided the minor victim with marijuana and the adult female prostitutes with crack cocaine, alcohol, and other controlled substances.

8. It was further part of the conspiracy that **JAMES MONROE DAVIS, a/k/a “Jay,” DUANE MASON a/k/a “Z-way,” a/k/a “Troy Dickerson,” and others both known and unknown to the Grand Jury provided clothing and food to the minor victim and adult female prostitutes in exchange for performance of commercial sex acts.**

9. It was further part of the conspiracy that **JAMES MONROE DAVIS, a/k/a “Jay,” DUANE MASON a/k/a “Z-way,” a/k/a “Troy Dickerson,” and others both known and unknown to the Grand Jury, used vehicles, public highways, hotels, private residences, telephones and the internet to facilitate the commercial sex acts.**

10. It was further part of the conspiracy that **JAMES MONROE DAVIS, a/k/a “Jay,” DUANE MASON a/k/a “Z-way,” a/k/a “Troy Dickerson,” and others both known and unknown to the Grand Jury, arranged for the transportation of and transported the minor victim from and between Maryland and the District of Columbia with the intent that the minor victim would engage in prostitution.**

Overt Acts

11. In furtherance of the conspiracy, and to effect the objects thereof, **JAMES MONROE DAVIS, a/k/a “Jay,” DUANE MASON a/k/a “Z-way,” a/k/a “Troy Dickerson,” and others both known and unknown to the Grand Jury, committed the following overt acts in the District of Maryland and elsewhere:**

a. At some time between April 21, 2010 and April 26, 2010, **JAMES**

MONROE DAVIS, a/k/a "Jay," DUANE MASON a/k/a "Z-way," a/k/a "Troy Dickerson," and others both known and unknown to the Grand Jury, instructed the minor victim on pricing for different sexual activities.

b. On or about April 23, 2010, **JAMES MONROE DAVIS, a/k/a "Jay," DUANE MASON a/k/a "Z-way," a/k/a "Troy Dickerson," and others both known and unknown to the Grand Jury, arranged for the transportation of and transported the minor to Washington, DC, where she was directed to walk an area known for prostitution in order to attract commercial sex consumers.**

c. On or about April 24, 2010, **JAMES MONROE DAVIS, a/k/a "Jay," DUANE MASON a/k/a "Z-way," a/k/a "Troy Dickerson," and others both known and unknown to the Grand Jury, took photographs of the minor in sexually explicit poses.**

d. On April 25, 2010, **JAMES MONROE DAVIS, a/k/a "Jay," DUANE MASON a/k/a "Z-way," a/k/a "Troy Dickerson," and others both known and unknown to the Grand Jury, used a computer to post the photographs of the minor on the "escort" section of backpage.com, an online advertising website, and listed a telephone number where the minor could be reached for a "date."**

e. On or about April 25, 2010, **JAMES MONROE DAVIS, a/k/a "Jay," DUANE MASON a/k/a "Z-way," a/k/a "Troy Dickerson," and others both known and unknown to the Grand Jury, obtained cellular phone minutes for use in fielding responses to the backpage.com advertisement for the minor victim.**

f. On April 26, 2010, **JAMES MONROE DAVIS, a/k/a "Jay," DUANE MASON a/k/a "Z-way," a/k/a "Troy Dickerson," and others both known and unknown to the**

Grand Jury, rented a room at the Motel 6 hotel in Gaithersburg, Maryland, for the minor victim to use during her "dates."

g. On April 26, 2010, **JAMES MONROE DAVIS, a/k/a "Jay," DUANE MASON** a/k/a "Z-way," a/k/a "Troy Dickerson," and others both known and unknown to the Grand Jury, drove the minor to meet an adult male undercover police officer, who paid the minor victim \$200 in exchange for a promised commercial sex act.

h. On April 26, 2010, **JAMES MONROE DAVIS, a/k/a "Jay," DUANE MASON** a/k/a "Z-way," a/k/a "Troy Dickerson," and others both known and unknown to the Grand Jury, followed the minor victim and the undercover officer to the hotel room, where the minor victim was to commit the commercial sex act.

18 U.S.C. § 1594(c)

COUNT TWO
(Sex Trafficking)

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in Paragraphs 1 through 3 and 5 through 11 of Count One of this Indictment are incorporated by reference here.
2. From in or about April 21, 2010, continuing through in or about April 26, 2010, in the District of Maryland and elsewhere, the defendant,

JAMES MONROE DAVIS, a/k/a "Jay,"

did knowingly, in and affecting interstate and foreign commerce, recruit, entice, harbor, transport, provide, obtain, and maintain by any means a person, namely, [REDACTED] and did benefit financially and by receiving anything of value from participation in a venture engaged in such acts, knowing, and in reckless disregard of the fact, that means of force, threats of force, fraud and coercion as defined in Title 18, United States Code, Section 1591(e)(2), and any combination of such means, would be used to cause [REDACTED] to engage in a commercial sex act, and knowing, and in reckless disregard of the fact, and having had a reasonable opportunity to observe [REDACTED] that [REDACTED] had not attained the age of 18 years and would be caused to engage in a commercial sex act.

18 U.S.C. § 1591(a)

18 U.S.C. § 2

COUNT THREE
(Use of Interstate Facilities to Transmit Information About a Minor)

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in Paragraphs 1 through 3 and 5 through 11 of Count One of this Indictment are incorporated by reference here.
2. On or about April 25, 2010, in the District of Maryland and elsewhere, the defendant,

JAMES MONROE DAVIS, a/k/a "Jay,"

using the mail and any facility or means of interstate and foreign commerce, knowingly initiated and attempted to initiate the transmission of the name, address, telephone number, social security number, and electronic email address of another individual—namely, the telephone number of [REDACTED] knowing that such other individual had not attained the age of 16 years, with the intent to entice, encourage, offer, or solicit any person to engage in any sexual activity for which any person can be charged with a criminal offense.

18 U.S.C. § 2425

18 U.S.C. § 2

COUNT FOUR
(Transporting a Minor to Engage in Prostitution)

The Grand Jury for the District of Maryland further charges that:

1. The allegations set forth in Paragraphs 1 through 3 and 5 through 11 of Count One of this Indictment are incorporated by reference here.

2. From in or about April 21, 2010, continuing through in or about April 26, 2010, in the District of Maryland, the District of Columbia, and elsewhere, the defendant,

JAMES MONROE DAVIS, a/k/a "Jay,"

did knowingly transport [REDACTED] an individual who had not attained the age of 18 years, in interstate commerce, with the intent that [REDACTED] engage in prostitution.

18 U.S.C. § 2423(a)
18 U.S.C. § 2

Rod J. Rosenstein
United States Attorney

A TRUE BILL:

FOREPERSON

DATE